

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
PAUL DAVID ROBERTS and :
CLAUDIA ANNE ROBERTS, : CHAPTER 13
Debtors :
: :
JACK N. ZAHAROPOULOS, :
STANDING CHAPTER 13 TRUSTEE, : CASE NO. 5-25-bk-00281-MJC
Movant :
: :
PAUL DAVID ROBERTS and :
CLAUDIA ANNE ROBERTS, :
Respondents : :

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 17th day of July 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Agatha R. McHale, Esquire, and objects to the confirmation of the above-referenced Debtors' Plan for the following reason:

1. Trustee avers that Debtors' Plan cannot be administered due to the lack of the following:

- a. Debtors have not provided Trustee paystubs for the months of January through June 2025.

WHEREFORE, Trustee alleges and avers that Debtors' Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

By: /s/ Agatha R. McHale, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 17th day of July 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Paul Murphy-Ahles, Esquire
Dethlefs, Pykosh & Murphy
2132 Market Street
Camp Hill, PA 17011

/s/ Derek M. Strouphauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee